

# Exhibit 5

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS  
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC  
COUNTY JUDGES AND COUNTY  
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP  
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

**PLAINTIFF UNITED STATES' SECOND SUPPLEMENTAL  
INITIAL DISCLOSURES**

Plaintiff United States hereby supplements its initial disclosures. These disclosures are made based on the information available to the United States at this time. The United States reserves the right to rely on additional discovery and investigations, and to supplement its disclosures as warranted thereby. The disclosures are made in a good faith effort to supply as much information and specification as is presently known but shall not prejudice the United States in relation to further discovery and investigations. Should other information become available during the course of ongoing investigation and discovery, it will be disclosed to other parties pursuant to Federal Rule 26(e). The second supplemental disclosures are organized below by reference to the categories set forth in Federal Rule 26(a)(1)(i)-(ii).

*Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information - along with the subject of that information - that the disclosing party may use to support its claims or defenses, unless solely for impeachment.*

**DISCLOSURE:** In addition to the individuals identified in the United States' Initial Disclosures and Supplemental Initial Disclosures, the following individuals are likely to have discoverable information that the United States may use to support its claim, unless the use would be solely for impeachment:

1. Michelle Curry, 3307 Holman Street, No. 2, Houston, TX 77004. (713) 566-0045. Ms. Curry will likely have discoverable information related to the effects of SB 14 on her ability to vote.
2. Marvin Holmes, 4002 Corder Street, No. 122, Houston, TX 77021. (832) 816-1738. Mr. Holmes will likely have discoverable information related to the effects of SB 14 on his ability to vote.
3. Hector Sanchez, 2510 Breedlove Street, Harlingen, TX 78550. (956) 793-6360. Mr. Sanchez will likely have discoverable information related to the effects of SB 14 on his ability to vote.
4. Phyllis Washington, 3938 Charleston Street, Houston, TX 77021. (832) 245-4232. Ms. Washington will likely have discoverable information related to the effects of SB 14 on her ability to vote.
5. Persons identified in all initial disclosures, supplements thereof, and discovery responses served by any party to these consolidated cases. These individuals will likely have discoverable information regarding the history, development, enactment, plans for implementation, and effects of SB 14.

*Rule 26(a)(1)(A)(ii): A copy - or a description by category and location - of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.*

**DISCLOSURE:** In addition to the documents and electronically stored information identified in the United States' Initial Disclosures and Supplemental Initial Disclosures, the United States may use the following additional documents and electronically stored information to support its

claim, unless the document or electronically stored information would be used solely for impeachment.

1. Documents and electronically stored information produced by any party in these actions that relate to the history, development, enactment, and plans for implementation of SB 14; effect of SB 14 on Hispanic and African-American voters; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; the lack of responsiveness to the particularized needs of the minority community; or racial appeals in political campaigns.
2. Documents and electronically stored information produced by any third party in these actions that relate to the history, development, enactment, and plans for implementation of SB 14; effect of SB 14 on Hispanic and African-American voters; the tenuousness of the legislature's purported justifications for photographic voter identification legislation; the lack of responsiveness to the particularized needs of the minority community; or racial appeals in political campaigns.
3. Copies of deposition transcripts and exhibits from any deposition taken in these actions.
4. Documents and electronically stored information identified in the initial disclosures, supplements thereof, and discovery responses served by any party in these actions.

The United States will serve on all parties the documents and electronically stored information identified herein on June 27, 2014 by overnight mail.

Date: June 25, 2014

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/s/ Elizabeth S. Westfall

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 25, 2014, I served a true and correct copy of the foregoing via electronic mail on the following counsel of record:

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